

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	Criminal No. 20-cr-40036-TSH
)	
VINCENT KIEJZO,)	
)	
Defendant.)	

JOINT MEMO RELATED TO FINAL STATUS CONFERENCE
SCHEDULED FOR MARCH 4, 2022

Now comes the United States of America and the defendant, Vincent Kiejzo, in a joint report related to the final status conference scheduled for March 24, 2022. The defendant is not yet in a position to elect a Rule 11 hearing or a pretrial conference before the district judge. On March 17, 2022, the district judge conducted a hearing on the defendant's appeal of the denial of his motion to compel discovery. (ECF #117) The parties are awaiting a ruling on that motion. The resolution of discovery matters will enable the parties to more accurately report for a final status conference in this case as to the nature of, and time necessary to prepare and file, substantive motions. The government and the defendant agree that the period from Kiejzo's first appearance upon his indictment on October 2, 2020 through March 24, 2022, the date currently set for the final status conference, was properly excluded by this Court's prior orders on excludable delay and by 18 U.S.C. § 3161(h)(1)(D) [ECF. 25,33, 37, 44, 48, 62, 70,72,86, 102,124,130,136, 138.] The government and the defendant further agree that the time period between March 24, 2022, and the next status conference should be excluded because the parties will use the period of the continuance to complete production and review of discovery, and also

to explore a non-trial disposition of the case. Therefore, the parties request that this Court find that the ends of justice served by excluding the period of this continuance outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

VINCENT KIEJZO,
By his Attorney

RACHAEL S. ROLLINS
UNITED STATES ATTORNEY

/s/Sandra Gant

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By: /s/Kristen M. Noto

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Date: March 23, 2022

CERTIFICATE OF SERVICE

I hereby certify that this document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and by regular mail to the participants who do not receive electronic filing.

/s/ Kristen M. Noto

Kristen M. Noto
Assistant U.S. Attorney

Date: March 23, 2022